

BLANK ROME LLP
Attorneys for Third-Party Defendants
Jeremy J.O. Harwood (JH 9012)
405 Lexington Avenue
The Chrysler Building
New York, NY 10174
(212) 885-5000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNDERWRITERS AT LLOYDS a/s/o
YOUNGLIN B & A CO., LTD.,
Plaintiff,

07 Civ. 6628 (PAC)

-against-

OCEAN WORLD LINES, INC.,
Defendant.

OCEAN WORLD LINES, INC.,

Third-Party Plaintiff,

-against-

ANL CONTAINER LINE PTY LIMITED t/a
ANL; ANL SINGAPORE PTE LTD.,
Third-Party Defendants.

**REPLY MEMORANDUM OF LAW OF ANL
CONTAINER LINE PTY LIMITED T/A ANL AND ANL
SINGAPORE PTE LTD. IN SUPPORT OF MOTION TO
COMPEL ARBITRATION AND FOR A STAY**

*Jeremy J.O. Harwood
Blank Rome LLP
The Chrysler Building
405 Lexington Avenue
New York, NY 10175
212-885-5000*

PRELIMINARY STATEMENT

Defendants ANL CONTAINER LINE PTY LIMITED t/a ANL and ANL SINGAPORE PTE LTD. (collectively “ANL”) submit this reply memorandum of law in support of its motion to compel arbitration and for a stay in response to the affidavit of Plaintiff’s counsel dated April 18, 2008 (“Campiese Affidavit”).

ARGUMENT

POINT I

ANL IS ENTITLED TO RECOGNITION OF ITS ARBITRATION RIGHTS IRRESPECTIVE OF THE SUM IN DISPUTE

Following the Court conference ANL was advised of the threat of sanctions if it sought to enforce its rights, recognized as a U.S. Treaty obligation. The Supreme Court in Preston v. Ferrer, ____ U.S. ___, 128 S. Ct. 978, 169 L. Ed.2d 917 (2008) has recently provided a reminder of the policy favoring arbitration.

POINT II

THE CAMPIESE AFFIDAVIT FAILS TO ADDRESS THE GROUNDS FOR STAYING THE ENTIRE ACTION

The Campiese Affidavit contains impermissible legal argument with addressing the grounds for staying the entire action. Louis Dreyfus Negoce S.A. v. Blystad Shipping & Trading, Inc., 88 F. Supp.2d 168 (S.D.N.Y. 2000) aff’d. 252 F.3d 218, 224 (2d Cir. 2001).

The Campiese Affidavit acknowledges that "Plaintiff was not in [contractual] priority with [ANL]" for which reason ANL was not originally named. Id., ¶ 11. Plaintiff fails to allege any cause of action against ANL.

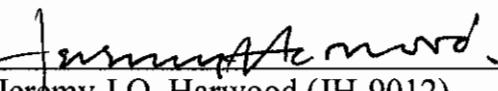
CONCLUSION

ANL respectfully requests that its motion to compel arbitration and to dismiss the complaint against it pursuant to 9 U.S.C. § 4 be granted; that a stay of the entire action be granted under 9 U.S.C. § 3 and for such other relief as may be equitable.

Dated: New York, New York
April 21, 2008

Respectfully submitted,

BLANK ROME LLP
Attorneys For Third-Party Defendants

By: 
Jeremy J.O. Harwood (JH-9012)
A Member of the Firm
405 Lexington Avenue
The Chrysler Building
New York, NY 10174
(212) 885-5000